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August 12, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

Re: Application of Qwest Communications International, Inc.
To Provide In-Region InterLATA Services in the States of Colorado,
Idaho, Iowa, Nebraska and North Dakota. WC Docket No. 02-148

Application of Qwest Communications International, Inc.
To Provide In-Region InterLATA Services in the States of Montana,
Utah, Washington & Wyoming. WC Docket No. 02-189

Dear Ms. Dortch:

At the request of the staff of the Wireline Competition Bureau, Qwest has provided the attached document detailing the order volumes associated with CLEC-specific flow-through rates and explaining why high flow-through rates based on low order volumes do not diminish the high flow-through capability that Qwest has demonstrated that it provides.

The twenty-page limit does not apply as set forth in DA 02-1390 and DA 02-1666.

Sincerely,

cc: M. Carowitz
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Flow-Through Rates and Volumes Under PO-2

The purpose of this document is to (1) provide order volumes associated with CLEC-specific flow-through rates that Qwest provided in its OSS Reply Declaration, and (2) explain why instances of CLECs having high flow-through rates based on low order volumes, to the extent that Qwest has presented these cases, do not diminish the high flow-through capability that Qwest has demonstrated that it provides.

1. ORDER VOLUMES FOR CLEC-SPECIFIC FLOW-THROUGH RATES

Commercial Performance Results for PO-2B UNE-P Orders:

Commercial performance results demonstrate that Qwest is capable of flowing through a high rate of UNE-P orders under PO-2B, including in large order volumes, on a CLEC-specific basis, regardless of whether those orders are submitted via the IMA-GUI or IMA-EDI.

The chart below supplements the CLEC-specific commercial performance results provided by Qwest in its OSS Reply Declaration for UNE-P orders under PO-2B submitted via the IMA-GUI with the associated order volumes.¹

¹ See OSS Reply Decl. at ¶ 111.

STATE	CLEC	Jan	Feb	Mar	Apr	May	Jun	Total Orders
CO	CLEC 1 (Orders)	92.01% (152)	87.84% (74)	94.58% (166)	90.77% (271)	94.27% (157)	91.59% (107)	748
ID	CLEC 1 (Orders)	90.51% (116)	92.16% (51)	99.06% (106)	83.16% (190)	96.26% (107)	97.12% (104)	674
IA	CLEC 2 (Orders)	No data reported	No data reported	91.67% (12)	94.37% (71)	83.33% (36)	100% (17)	133
IA	CLEC 3 (Orders)	93.02% (43)	94.12% (17)	87.50% (16)	85.00% (20)	100.00% (14)	86.96% (23)	136
NE	CLEC 4 (Orders)	No data reported	97.47% (1,187)	96.12% (335)	95.88% (607)	95.18% (166)	98.53% (68)	2,363
ND	CLEC 5 (Orders)	72.22% (18)	76.19% (21)	90.91% (11)	66.67% (9)	89.29% (28)	92.31% (13)	61

The results for UNE-P orders under PO-2B submitted via the IMA-GUI show that Qwest is capable of flowing through a high percentage of orders at significant order volumes. For example, in Nebraska Qwest flowed through better than 95% of orders submitted by CLEC 4 in each month between February 2002 and June 2002 even while order levels reached 1,187 in February and 607 in April. In Colorado, Qwest exceeded a flow-through rate of 90% of orders submitted by CLEC 1 in five of the past six months even while CLEC 1 consistently submitted well over 100 orders in each of those months.

The chart below supplements the CLEC-specific commercial performance results provided by Qwest in its OSS Reply Declaration for UNE-P orders under PO-2B submitted via IMA-EDI with the associated order volumes.²

² See OSS Reply Decl. at ¶ 112.

STATE	CLEC	Jan	Feb	Mar	Apr	May	Jun	Total Orders
CO	CLEC 1 (Orders)	77.94% (408)	80.32% (315)	89.84% (315)	90.77% (271)	84.73% (406)	82.06% (379)	2,094
ID	CLEC 1 (Orders)	83.38% (325)	72.40% (221)	83.95% (162)	83.16% (190)	88.95% (172)	94.74% (209)	1,279
IA	CLEC 6 (Orders)	No data reported	No data reported	No data reported	No data reported	96.69% (151)	92.75% (69)	220
NE	CLEC 1 (Orders)	83.33% (18)	89.47% (19)	100% (9)	85.71% (14)	83.33% (12)	100% (6)	78
ND	CLEC 6 (Orders)	No data reported	No data reported	No data reported	No data reported	98.11% (53)	100% (17)	61

As with UNE-P orders under PO-2B submitted via the IMA-GUI, the commercial performance results for UNE-P orders under PO-2B submitted via IMA-EDI also demonstrate that Qwest is capable of flowing through a high rate of orders on a CLEC-specific basis at significant order volumes. For example, in Colorado Qwest has flowed through better than 80% of orders submitted by CLEC 1 via IMA-EDI over the past five months while order volumes exceeded 270 in each of those months.

Commercial Performance Results for Orders under PO-2A:

CLEC-specific performance results for the very same month of commercial performance results that AT&T used to support its argument that Qwest's performance under PO-2A is deficient ³ -- April 2002 -- reveal that Qwest is capable of flowing through a high rate of orders under PO-2A, including in large order volumes.

³ See AT&T Comments, Finnegan/Connolly/Menezes Decl. at ¶¶ 153-159.

In April 2002 individual CLECs achieved the following flow-through rates in Colorado for each product measured under PO-2A: ⁴

Product	CLEC	April 2002 Rate	Total Orders
Resale (GUI)	CLEC 1	100%	6
Resale (EDI)	CLEC 2	85%	724
Loops (GUI)	CLEC 3	89%	9
Loops (EDI)	CLEC 4	91%	256
LNP (GUI)	CLEC 5	64%	14
LNP (EDI)	CLEC 6	72%	4,497
UNE-P POTS (GUI)	CLEC 1	100%	4
UNE-P POTS (EDI)	CLEC 7	58%	423

These results reveal that Qwest is capable of flowing through a high rate of orders at large volumes in Colorado as Qwest flowed through: 85% of 724 Resale orders submitted via IMA-EDI by CLEC 2; 91% of 256 Unbundled Loops orders submitted via IMA-EDI by CLEC 4; and 72% of 4,497 LNP orders submitted via IMA-EDI by CLEC 6.

In April 2002 individual CLECs achieved the following flow-through rates in Idaho for each product measured under PO-2A: ⁵

Product	CLEC	April 2002 Rate	Total Orders
Resale (GUI)	CLEC 8	100%	4
Resale (EDI)	CLEC 7	71%	323
Loops (GUI)	CLEC 7	64%	11
Loops (EDI)	CLEC 7	61%	270
LNP (GUI)	CLEC 9	46%	13
LNP (EDI)	No data reported	No data reported	N/A
UNE-P POTS (GUI)	CLEC 7	70%	107
UNE-P POTS (EDI)	CLEC 7	50%	314

⁴ See Colorado Commercial Performance Results at 52-55 (PO-2A).

⁵ See Idaho Commercial Performance Results at 50-52 (PO-2A).

As Qwest flowed through 71% of 323 Resale orders and 61% of 270 Unbundled Loops orders submitted via IMA-EDI by CLEC 7, it is evident that Qwest is capable of flowing through a high rate of orders under PO-2A at large volumes in Idaho.

In April 2002 individual CLECs achieved the following flow-through rates in Iowa for each product measured under PO-2A: ⁶

Product	CLEC	April 2002 Rate	Total Orders
Resale (GUI)	CLEC 10	93%	27
Resale (EDI)	No data reported	No data reported (one LSR)	N/A
Loops (GUI)	CLEC 11	100%	1
Loops (EDI)	CLEC 12	42%	62
LNP (GUI)	CLEC 13	78%	236
LNP (EDI)	No data reported	No data reported	N/A
UNE-P POTS (GUI)	CLEC 7	100%	1
UNE-P POTS (EDI)	No data reported	No data reported	N/A

As Qwest flowed through 78% of 236 LNP orders submitted via the IMA-GUI by CLEC 13, it is evident that Qwest is capable of flowing through a high rate of orders under PO-2A at large volumes in Iowa.

In April 2002 individual CLECs achieved the following flow-through rates in Nebraska for each product measured under PO-2A: ⁷

Product	CLEC	April 2002 Rate	Total Orders
Resale (GUI)	CLEC 14	100%	7
Resale (EDI)	CLEC 7	81%	494
Loops (GUI)	CLEC 6	67%	6
Loops (EDI)	CLEC 7	66%	343
LNP (GUI)	CLEC 13	77%	2,122
LNP (EDI)	No data reported	No data reported	N/A
UNE-P POTS (GUI)	CLEC 7	100%	4
UNE-P POTS (EDI)	CLEC 7	40%	30

⁶ See Iowa Commercial Performance Results at 51-54 (PO-2A).

⁷ See Nebraska Commercial Performance Results at 51-54 (PO-2A).

These results reveal that Qwest is capable of flowing through a high rate of orders at large volumes in Nebraska as Qwest flowed through: 81% of 494 Resale orders and 66% of 343 Unbundled Loops orders submitted via IMA-EDI by CLEC 7; and 77% of 2,122 LNP orders submitted via IMA-GUI by CLEC 13.

In April 2002 individual CLECs achieved the following flow-through rates in North Dakota for each product measured under PO-2A: ⁸

Product	CLEC	April 2002 Rate	Total Orders
Resale (GUI)	CLEC 7	100%	1
Resale (EDI)	CLEC 7	15%	26
Loops (GUI)	CLEC 7	100%	2
Loops (EDI)	CLEC 7	68%	160
LNP (GUI)	CLEC 15	24%	37
LNP (EDI)	No data reported	No data reported	N/A
UNE-P POTS (GUI)	CLEC 16	13%	48
UNE-P POTS (EDI)	No data reported	No data reported	N/A

Although flow-through rates for LNP and UNE-P orders submitted via the IMA-GUI and Resale orders submitted via IMA-EDI were relatively low in April in North Dakota, these rates are attributable to low order volumes. ⁹ Nevertheless, as Qwest flowed through 68% of 160 Unbundled Loops orders submitted via IMA-EDI by CLEC 7, it is evident that Qwest is capable of flowing through a high rate of orders under PO-2A at large volumes in North Dakota.

The commercial performance results show that, contrary to AT&T's assertion, Qwest is capable of flowing through a high rate of UNE-P orders,

⁸ See North Dakota Commercial Performance Results at 45-48 (PO-2A).

⁹ *Id.*

including in large order volumes, under PO-2A in each of Colorado, Idaho, Iowa, Nebraska and North Dakota.

Commercial Performance Results for PO-2 Resale Orders:

Comprehensive CLEC-specific commercial performance results for all products under PO-2, including orders for Resale, already have been provided to the Commission.¹⁰ These results demonstrate that Qwest is capable of flowing through a high rate of Resale orders, including in large volumes, under PO-2.

2. LIMITED INSTANCES OF HIGH FLOW-THROUGH RATES BASED ON LOW ORDER VOLUMES DO NOT DIMINISH A FINDING THAT QWEST IS CAPABLE OF FLOWING THROUGH A HIGH RATE OF ORDERS IN LARGE VOLUMES.

Qwest realizes that even though it presents high CLEC-specific flow-through rates, in certain instances these flow-through rates are associated with low order volumes. But of the CLEC-specific performance results under PO-2 offered above, there are more cases of high flow-through rates based on large order volumes than high flow-through rates based on low order volumes. Therefore, a limited number of high flow-through rates based on low order volumes does not diminish a finding that Qwest is capable of flowing through a high rate of orders under PO-2 in large volumes.

¹⁰ See Qwest Ex Parte, dated July 17, 2002, on CLEC-specific Commercial Performance Results under PO-2 and PO-4 between February 2002 and May 2002; Qwest Ex Parte, dated July 29, 2002, on CLEC-specific Commercial Performance Results under PO-2A and PO-2B in June 2002.